

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 1:16-cv-03088-
	)	ELR
STATE OF GEORGIA,	)	
	)	
Defendant.	)	
	)	

**UNITED STATES’ MOTION FOR LEAVE TO FILE DOCUMENTS  
UNDER SEAL**

Plaintiff United States of America, by and through below counsel of record, moves this Court, pursuant to the Court’s Amended Protective Order, ECF No. 118-2, for leave to file Exhibits 7-23, 28, and 35-42 in support of its Corrected Opposition to Defendant’s Motion for Summary Judgment (ECF No. 448-1), Corrected Responses to Defendant’s Statement of Undisputed Facts (ECF No. 448-2), and Additional Statement of Undisputed Material Facts (ECF No. 448- 3) under seal. These exhibits contain Confidential Information protected under the Amended Protective Order, including personally identifiable information about individual students and their parents. A proposed order is attached for the Court’s consideration.

Dated: November 30, 2023

Respectfully submitted:

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United States Attorney  
Northern District of Georgia

/s/ Aileen Bell Hughes

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UNITED STATES OF AMERICA,

PLAINTIFF,

v.

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DEFENDANT.

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**Certificate of Compliance**

I hereby certify, pursuant to Local Rules 5.1 and 7.1D, that the foregoing motion has been prepared using Times New Roman, 14-point font.

November 30, 2023.

*/s/ Crystal Adams*

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CRYSTAL ADAMS

**IN THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN DISTRICT  
OF GEORGIA ATLANTA DIVISION**

UNITED STATES OF AMERICA,

PLAINTIFF,

v.

STATE OF GEORGIA,

DEFENDANT.

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**Certificate of Service**

I served this document today by filing it using the Court's CM/ECF system, which automatically notifies the parties and counsel of record.

November 30, 2023.

/s/ Crystal Adams

CRYSTAL ADAMS